

KELLEY DRYE & WARREN LLP

NEW YORK, NY WASHINGTON, DC CHICAGO, IL HOUSTON, TX
LOS ANGELES, CA SAN DIEGO, CA PARSIPPANY, NJ STAMFORD, CT

Michael C. Lynch
3 World Trade Center
175 Greenwich Street
New York, NY 10007
Tel: (212) 808-5082
Fax: (212) 808-7897
mlynch@kelleydrye.com

January 5, 2022

By ECF

The Honorable Cheryl L. Pollak, U.S.M.J.
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: LaFrantz v. Diocese of Brooklyn, et al.,
Civ. Action No. 21-cv-04920-FB-CLP

Dear Magistrate Judge Pollak,

We represent defendant The Roman Catholic Diocese of Brooklyn, New York (the “Brooklyn Diocese”), s/h/a as the Diocese of Brooklyn. With the consent of counsel for defendant St. Mary’s Roman Catholic Church (together with the Brooklyn Diocese, the “Defendants”), we write to request a 30-day extension of time for the Defendants to respond to the complaint through and including February 3, 2022.

We seek the extension of time because we were only recently retained to represent the Brooklyn Diocese in this lawsuit. We require additional time to review and analyze the complaint and to otherwise get up to speed. Based on our review of the docket, we understand that plaintiff’s counsel entered into a prior stipulation with other counsel concerning service of the complaint and a response date thereto. This is our first request for an extension of time to respond to the complaint. We originally made the request to Judge Block, who directed us to make the application to Your Honor. See January 5, 2022 Electronic Order.

Accordingly, we request that the Court grant Defendants a 30-day extension of time to respond to the complaint.

Thank you in advance for your consideration.

Respectfully,



Michael C. Lynch

cc: Francis J. Scahill, Esq. (counsel for defendant St. Mary’s Roman Catholic Church) (via email)
Darren Wolf (counsel for plaintiff) (via ECF)